

2
HAGOP T. BEDOYAN, CSB NO. 131285
KLEIN, DENATALE, GOLDNER,
COOPER, ROSENLIEB & KIMBALL, LLP
5260 N. Palm Avenue, Suite 201
Fresno, California 93704
Telephone: (559) 438-4374
Facsimile: (559) 432-1847
Email: hbedoyan@klein.com

Attorneys for Debtor-in-Possession

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA**

SAN JOSE DIVISION

In re:

Case No. 09-52610

LIGHTHOUSE LODGE, LLC

Chapter 11

Debtor-in-Possession.

DC No. KDG-11

Date: N/A

Time: N/A

Place: United States Bankruptcy Court
280 S. First Street
San Jose, California

San Jose, California
Judge: Honorable Roger J. Efremsky

**EX PARTE APPLICATION TO EXTEND EMPLOYMENT
OF REAL ESTATE BROKER**

TO THE HONORABLE ROGER L. EFREMSKY, UNITED STATES BANKRUPTCY
JUDGE:

Debtor, LIGHTHOUSE LODGE, LLC (“Debtor”), submits this *Ex Parte Application to Extend Employment of Real Estate Broker* and represent as follows:

1. Debtor filed a Voluntary Petition under Chapter 11 on April 9, 2009.
2. On April 30, 2010 the Court entered an order employing Sofi Choi of Grubb & Ellis (“Broker”) as the real estate broker for the estate. The Listing Agreement associated with that order expired on October 28, 2009.

3. The Debtor would like to continue working with Broker and is seeking an order from the Court approving the Agreement to Amend Terms, Price or Time in Authorization (“Agreement”) filed concurrently herewith as Exhibit “A” to the *Exhibits to Ex Parte Application to Extend Employment of Real Estate Broker*. The Agreement extends the listing period to June 30, 2010 or upon confirmation of any plan of reorganization, other than the one proposed by Debtor, whichever comes first.
4. Based upon the foregoing, Debtor believes that good cause exists to extend the employment of Broker from October 28, 2009, to June 30, 2010 or upon confirmation of any plan of reorganization, other than the one proposed by Debtor, whichever comes first.

WHEREFORE, the Debtor requests that the Court extend the employment of Broker from October 28, 2009, to June 30, 2010 or upon confirmation of any plan of reorganization, whichever comes first.

Date: March 1, 2010

KLEIN, DeNATALE, GOLDNER,
COOPER, ROSENLIEB & KIMBALL, LLP

By: /s/ Hagop T. Bedoyan
HAGOP T. BEDOYAN
Attorneys for Debtor-in-Possession